

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Eastern District of Pennsylvania

Case number (if known): 24-13093 Chapter 11

☐ Check if this is an amended filing

Official Form 105

Involuntary Petition Against an Individual

12/15

Use this form to begin a bankruptcy case against an individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against a non-individual, use the *Involuntary Petition Against a Non-individual* (Official Form 205). Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

1. Chapter of the Bankruptcy Code

Check one:

- ☐ Chapter 7
☒ Chapter 11

Part 2: Identify the Debtor

2. Debtor's full name

Alan

First name

Christopher

Middle name

Redmond

Last name

Suffix (Sr., Jr., II, III)

3. Other names you know the debtor has used in the last 8 years

Include any assumed, married, maiden, or trade names, or doing business as names.

4. Only the last 4 digits of debtor's Social Security Number or federal Individual Taxpayer Identification Number (ITIN)

☐ Unknown

XXX - XX - 5 0 9 2

OR

9 XX - XX -

5. Any Employer Identification Numbers (EINs) used in the last 8 years

☒ Unknown

EIN

EIN

Debtor Alan Christopher Redmond

Case number (if known) _____

6. Debtor's address

Principal residence

Mailing address, if different from residence

2005 Regency Drive
Number Street

Number Street

Wyomissing PA 19610
City State ZIP Code

City State ZIP Code

Berks
County

Principal place of business

Number Street

City State ZIP Code

County

7. Type of business

☐ Debtor does not operate a business

Check one if the debtor operates a business:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☒ None of the above

8. Type of debt

Each petitioner believes:

- ☐ Debts are primarily consumer debts. Consumer debts are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."
☒ Debts are primarily business debts. Business debts are debts that were incurred to obtain money for a business or investment or through the operation of the business or investment.

9. Do you know of any bankruptcy cases pending by or against any partner, spouse, or affiliate of this debtor?

☐ No

☒ Yes. Debtor National Brokers of America, Inc. Relationship Shareholder/Owner
District Eastern District Date filed 09/03/2019 Case number, if known 19-15488
MM / DD / YYYY

Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY

Debtor

Alan Christopher Redmond

Case number (if known)

Part 3: Report About the Case

10. Venue

Reason for filing in this court.

Check one:

- ☒ Over the last 180 days before the filing of this bankruptcy, the debtor has resided, had the principal place of business, or had principal assets in this district longer than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.
- ☐ Other reason. Explain. (See 28 U.S.C. § 1408.)

11. Allegations

Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).

The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

At least one box must be checked:

- ☒ The debtor is generally not paying such debtor's debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.
- ☐ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?

- ☒ No
- ☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

13. Each petitioner's claim

Name of petitioner	Nature of petitioner's claim	Amount of the claim above the value of any lien
Jason Scott Jordan	Judgment for Unpaid Wages & Attorneys Fees	\$ 13,105,197.20
Cornerstone Law Firm LLC	Judgement for Attorney Fees	\$ 10,484.50
Ethan Shalter	Breach of Contract	\$ 1,036.08
Total		\$ 13,116,717.78

If more than 3 petitioners, attach additional sheets with the statement under penalty of perjury, each petitioner's (or representative's) signature under the statement, along with the signature of the petitioner's attorney, and the information on the petitioning creditor, the petitioner's claim, the petitioner's representative, and the attorney following the format on this form.

Debtor Alan Christopher Redmond

Case number (if known) _____

Part 4: Request for Relief

Petitioners request that an order for relief be entered against the debtor under the chapter specified in Part 1 of this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, a certified copy of the order of the court granting recognition is attached.

Petitioners declare under penalty of perjury that the information provided in this petition is true and correct. Petitioners understand that if they make a false statement, they could be fined up to \$250,000 or imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152 and 3571. If relief is not ordered, the court may award attorneys' fees, costs, damages, and punitive damages. 11 U.S.C. § 303(i).

Petitioners or Petitioners' Representative

X Joel A. Ready
Joel A. Ready (Aug 15, 2024 09:54 EDT)

Signature of petitioner or representative, including representative's title

Cornerstone Law Firm, LLC

Printed name of petitioner

Date signed 08/15/2024
MM / DD / YYYY

Mailing address of petitioner

8500 Allentown Pike, Suite 3

Number Street

Blandon PA 19510
City State ZIP Code

If petitioner is an individual and is not represented by an attorney:

Contact phone _____

Email _____

Name and mailing address of petitioner's representative, if any

Joel Ready, Esquire

Name

8500 Allentown Pike, Suite 3

Number Street

Blandon PA 19510
City State ZIP Code

Attorneys

X Joel A. Ready
Joel A. Ready (Aug 15, 2024 09:54 EDT)

Signature of attorney

Joel A. Ready, Esquire

Printed name

Cornerstone Law Firm, LLC

Firm name, if any

8500 Allentown Pike, Suite 3

Number Street

Blandon PA 19510
City State ZIP Code

Date signed 08/15/2024
MM / DD / YYYY

Contact phone (610) 926-7875 Email joel@cornerstonelaw.us

Debtor Alan Christopher Redmond

Case number (if known) _____

x Jason Jordan

Jason Jordan (Aug 15, 2024 09:35 EDT)

Signature of petitioner or representative, including representative's title

Jason Scott Jordan

Printed name of petitioner

Date signed 08/15/2024
MM / DD / YYYY

Mailing address of petitioner

10802 Northwest 56th Ct.

Number Street

Coral Springs FL 33046
City State ZIP Code

Name and mailing address of petitioner's representative, if any

Name _____

Number Street _____

City State ZIP Code _____

x ES

Alan Shalter (Aug 15, 2024 09:35 EDT)

Signature of petitioner or representative, including representative's title

Ethan Shalter

Printed name of petitioner

Date signed 08/15/2024
MM / DD / YYYY

Mailing address of petitioner

1360 Philip Ave.

Number Street

Birdsboro PA 19508
City State ZIP Code

Name and mailing address of petitioner's representative, if any

Name _____

Number Street _____

City State ZIP Code _____

x Joel A. Ready

Joel A. Ready (Aug 15, 2024 09:54 EDT)

Signature of Attorney

Joel A. Ready, Esquire

Printed name

Cornerstone Law Firm, LLC

Firm name, if any

8500 Allentown Pike, Suite 3

Number Street

Blandon PA 19510
City State ZIP Code

Date signed 08/15/2024
MM / DD / YYYY

Contact phone (610) 926-7875 Email joel@cornerstonelaw.us

x Joel A. Ready

Joel A. Ready (Aug 15, 2024 09:54 EDT)

Signature of Attorney

Joel A. Ready, Esquire

Printed name

Cornerstone Law Firm, LLC

Firm name, if any

8500 Allentown Pike, Suite 3

Number Street

Blandon PA 19510
City State ZIP Code

Date signed 08/15/2024
MM / DD / YYYY

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ALAN CHRISTOPHER REDMOND	Bankruptcy No. Chapter 11. Involuntary Petition
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INFORMATION IN SUPPORT OF OFFICIAL FORM 105
INVOLUNTARY PETITION AGAINST INDIVIDUAL

NOW COMES Jason Scott Jordan, Cornerstone Law Firm, LLC., and Ethan Shulter (hereinafter “Creditors”), by and through Cornerstone Law Firm hereby files this Information in support of Official Form 105 Involuntary Petition Against Individual and offers the following:

1. Alan Christopher Redmond is an individual person who resides in 1198 Reading Blvd., Wyomissing, PA 19610 and is the subject of this Involuntary Petition as the Debtor.
2. Jason Scott Jordan resides in 10802 Northwest 56th Ct., Coral Springs, FL 33046 and is a holder of a claim against Debtor in the amount of \$13,105,197.20 that is not contingent as to liability or the subject of a bona fide dispute under 11 U.S.C § 303(b)(1). *See Exhibit 1.*
3. Cornerstone Law Firm, LLC. is a business entity with its principal place of business in 8500 Allentown Pike #3, Blandon, PA 19510 and is a holder of a claim against Alan C. Redmond in the amount of \$10,484.50 that is not contingent as to liability or the subject of a bona fide dispute under 11 U.S.C § 303(b)(1). *See Exhibit 2.*
4. Ethan Shalter resides in 1360 Philip Ave., Birdsboro, PA 19508 and is a holder of a claim against Alan C. Redmond in the amount of \$1,036.00 that is not contingent as to liability or the subject of a bona fide dispute 11 U.S.C § 303(b)(1). *See Exhibit 3.*
5. Creditors in the aggregate hold claims against the Debtor in the amount over \$18,600.00 meeting the requirements of 11 U.S.C § 303(b)(1).

6. Petitioners believe, and aver, that Debtor has fewer than 12 holders of a claim, excluding any employee or insider of the Debtor, as defined by 11 U.S.C. § 303(b)(1).

7. Creditors request this honorable court to oust the Debtor from possession of his assets and to immediately appoint an Interim Trustee for cause, including fraud, dishonesty, incompetence, or gross mismanagement of the Debtor by current management in the best interest of the creditors and for the preservation of assets to prevent loss of estate property as further set forth in the motion for emergent relief. See 11 U.S.C § 303(f); 11 U.S.C § 1104(a)(1).

8. In addition, the Creditors request this honorable court under its injunctive powers to limit the Debtor's right to continue to operate any business, and to use, acquire, or dispose of property as further set forth in the motion for emergent relief. See 11 U.S.C § 105; 11 U.S.C § 303(f).

9. Upon order for relief, Creditors request this honorable court to designate a responsible party to file Schedules on behalf of the Debtor to prevent the dissipation of assets by fraud, dishonesty, incompetence or gross mismanagement of the Debtor and to ensure compliance under the contempt procedures of the Bankruptcy Court. See Fed. R. Bankr. P. 9001(5); Fed. R. Bankr. P. 9020.

10. Upon service of process to the Debtor, Creditors request this honorable court to schedule a hearing and disposition of the Involuntary Petition at the earliest practicable time. See Fed. R. Bankr. P. 1013.

WHEREFORE, based on the foregoing, the Court should prospectively grant the Creditor's request and other relief as the Court deems necessary, just, or appropriate.

Respectfully submitted,

CORNERSTONE LAW FIRM, LLC

By: Joel A. Ready

Joel A. Ready, Esquire
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Blandon, PA 19510
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